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90 New Montgomery Street, Suite 1010
San Francisco, CA 94105
(415) 281-8730
(415) 281-8735 FAX
www.techlawinc.com

August 27, 2004

Mr. James Chang (SFD-8-1)
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

Subject: **Contract No. 68-W-98-0220 / WA No. 220-11-09WQ**
George/Norton Air Force Base Work Assignment
Review of the Draft Building 513 Chlordane Investigation Work Plan, for George Air Force Base California, July 2004

Dear Mr. Chang:

Attached to this letter are TechLaw's review comments on the Draft Building 513 Chlordane Investigation Work Plan for George Air Force Base, California, dated July 2004. These comments suggest that the Air Force should clarify and revise the sampling approach based on more specific data quality objectives, particularly if the data may be usedn a risk assessment.

This evaluation is being forwarded to you through electronic mail (via Internet) in WordPerfect® Version 6/7/8 format. A hard copy of the evaluation will also be submitted with this cover letter. TechLaw understands you will review and augment the evaluation at your discretion. TechLaw appreciated the opportunity to provide technical oversight services to the EPA on this project. Please contact Bill Mabey, site Manager, at (415) 281-8730 extension 14. If you have any comments or questions regarding this evaluation.

Sincerely,

Indira Balkissoon
Regional Manager

LK:BM:IB:sm

cc: Patricia Brown-Derocher/Central files, TechLaw, Inc.

Geo130-052 Bldg513ChlordaneInv

GEORGE AIR FORCE BASE
Victorville, California

Review of the Draft Building 513 Chlordane Investigation Work Plan

Submitted to:

Mr. James Chang
EPA Work Assignment Manager
U.S. Environmental Protection Agency
Region IX SFD-8-1
75 Hawthorne Street
San Francisco, California 94105

Submitted by:

TechLaw Inc.
90 New Montgomery
Suite 1010
San Francisco, California 94105

EPA Work Assignment No.	**220-11-09WQ**
Contract No.	**68-W-98-0220**
EPA WAM	**James Chang**
Telephone No.	**(415) 972-3193**
TechLaw Site Manager	**Bill Mabey**
Telephone No.	**(415) 281-8730 x 14**

August 27, 2004

Review of the Draft Building 513 Chlordane Investigation Work Plan
George Air Force Base
July 2004

GENERAL COMMENTS

1. The draft Building 513 Chlordane Investigation Work Plan proposes collecting surface soil samples on a 20-foot grid to a depth of between 12 and 18 inches, but it is unclear whether the analytical data will be appropriate for some Data Quality Objectives (DQOs). If the areas to be sampled are known to contain clean fill soils on top of the potentially contaminated soils, the sampling at these depths may be justified to evaluate the areal presence of the chlorinated pesticides and possible pathways to groundwater. It should be recognized that the erosional transport of these pesticides across and from the site may not be identified by soil samples from these depths. Importantly, the possible application of these data in a risk assessment are problematic as they are not representative of surface soils that constitute exposure scenarios (dermal, inhalation, or soil ingestion.) Additionally, it may not be appropriate to apply data collected around a building in a risk assessment as each sample may represent a different source (point of release, erosional pathway, or uncontaminated soil.) Please revise the Work Plan to address specific DQOs, particularly for both human health and ecological risk assessment applications.

2. The Work Plan does not include investigation of discharge lines from the building, such as the sanitary sewer line. It appears that discharges of pesticides to the sanitary sewer may have occurred. A leaking sewer line could cause discharges to the subsurface. One or two proposed sampling points are in the vicinity of the sanitary sewer line; however, the depth of the sewer line is not provided in the Work Plan, therefore it is not clear if any contamination associated with the sewer line would be detected. Similarly, the depth of the bottom of the floor drain in the wash rack room is not provided. It is not clear if the proposed sample at the floor drain will be at a sufficient depth to detect any discharge from the floor drain. Please revise the Work Plan to include investigation of soils in the vicinity of the sanitary sewer line, and revise the Work Plan to include depth of the sewer line and the floor drain.